



**HELEN F. DALTON & ASSOCIATES, P.C.**  
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**MEMO ENDORSED**

November 29, 2022

**Via ECF**

The Honorable District Judge Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: **Sanchez v. Cosan Construction Corp., et al.**  
**22-CV-8420 (KMK)**

Dear Judge Karas:

Our office represents the Plaintiffs in the above-referenced matter and submit this letter to provide a status report to the Court.

Pursuant to the executed summons filed at Dkt. Nos. 7 and 8, Defendants were to respond to the Complaint either by November 12, 2022 or by November 14, 2022. To date, no Defendant has formally appeared or has responded to the Complaint.

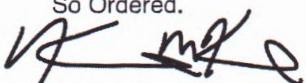
However, last week, we were contacted by attorney Jason Finkelstein, Esq. of Cole Schotz, P.C., who advised that his firm was in the process of being retained by Defendants but had not yet been formally retained. Our understanding is that Defendants will have formally retained counsel in the next two weeks so that they can make the appropriate application to the Court requesting an extension of time to respond to the Complaint.

As such, we kindly ask the Court for two weeks – or by December 12, 2022 – to either allow Defendants' counsel to formally appear or to allow Plaintiffs to provide a further status report regarding the status of this matter and their anticipated course of action.

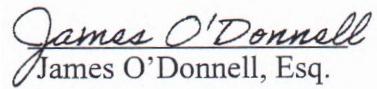
We thank the Court for its consideration and remain available to provide any additional information.

Granted.

So Ordered.

  
11/29/22

Respectfully submitted,

  
James O'Donnell  
James O'Donnell, Esq.

**CC (via e-mail):**

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